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2 United States Attorney
3 District of Nevada

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11 Attorney for Defendant

12 **UNITED STATES DISTRICT COURT**

13 **DISTRICT OF NEVADA**

14 ABEL FRIAS,)
15 Plaintiff,) Civil No. 2:15-cv-01348-JCM-VCF
16 v.)
17 CAROLYN W. COLVIN,) **DEFENDANT'S UNOPPOSED MOTION**
18 Acting Commissioner of Social Security,) **FOR EXTENSION OF TIME**
19 Defendant.)
20 _____)

21 Defendant Carolyn W. Colvin, Acting Commissioner of Social Security (“Defendant”)
22 respectfully requests that the Court extend the time for Defendant to file her Cross-Motion to Affirm
23 and Response to Plaintiff’s Motion for Reversal, due on **November 10, 2015**, by **30 days**, through
24 and including **December 10, 2015**.

25 An extension of time is needed because counsel for Defendant is currently responsible for
26 numerous district court cases at various stages of litigation. Counsel for Defendant is also currently
27 responsible for conducting discovery and preparing substantive motions in personnel-related
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1 litigation matters pending before the Equal Employment Opportunity Commission and Central
2 District Court of California.

3 Counsel for Defendant conferred with Plaintiff's counsel, who has no opposition to this
4 motion, on November 6, 2015.

5 Respectfully submitted this 6th day of November 2015.

6
7 DANIEL G. BOGDEN
United States Attorney

8 /s/ Sundeep Patel
9 SUNDEEP PATEL
10 Special Assistant United States Attorney

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12 OF COUNSEL:

13 DEBORAH LEE STACHEL
14 Acting Regional Chief Counsel, Region IX

15
16
17 IT IS SO ORDERED:

18 
19 _____
20 UNITED STATES MAGISTRATE JUDGE
21 DATED: November 6, 2015
22 _____
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CERTIFICATE OF SERVICE

I, **Sundeep Patel**, certify that the following individual was served with a copy of the **UNOPPOSED MOTION FOR EXTENSION OF TIME** on the date and via the method of service identified below:

CM/ECF:

LEONARD H. STONE, ESQ. No. 5791
NICOLE K. STEINHAUS, ESQ. No. 11722
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Attorneys for Plaintiff, ABEL FRIAS

Dated this 6th day of November 2015

//s// Sundeept Patel
SUNDEEPT PATEL
Special Assistant United States Attorney